

**Federal Defenders  
OF NEW YORK, INC.**

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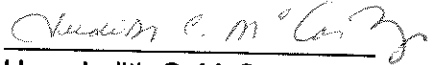
David E. Patton  
*Executive Director  
and Attorney-in-Chief*

*Southern District of New York*  
Jennifer L. Brown  
*Attorney-in-Charge*

June 28, 2024

The Hon. Judith C. McCarthy  
United States Magistrate Judge  
United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601

APPLICATION GRANTED

  
Hon. Judith C. McCarthy

6-28-2024

Re: *United States v. Jayleen Mota*, Case No. 23-mj-3028

Dear Judge McCarthy,

I am writing to request that the Court modify the terms of Ms. Mota's deferred prosecution conditions to permit her to travel to the Dominican Republic for her younger sister's birthday celebration on or about July 6, 2024 for approximately two weeks. Her sister, who lives in the Dominican Republic with extended family, is turning 18 this month.

By way of background, Ms. Mota was arrested on April 17, 2023, on one count of transmitting threats in interstate commerce, in violation of 18 U.S.C. § 875(c). That same day, the Court released Ms. Mota on an agreed-upon bail package. Ms. Mota complied with all pretrial conditions. On February 27, 2024, Ms. Mota and the government entered into a deferred prosecution agreement. The same conditions of release continued.

I have discussed this requested modification with AUSA Timothy Ly. He does not object to this requested modification.

I also discussed this requested modification with Pretrial Services Officer Laura Gialanella. She explained that Pretrial Services does not take a position on international travel, but reports that Ms. Mota has been in full compliance with the conditions of her deferred prosecution agreement and has been timely with her monthly restitution payments.

If this modification is approved, Ms. Mota will provide her supervising officer with the address at which she will be staying and the flight details.

Thank you for your consideration of this request.

Sincerely,



Rachel Martin  
Assistant Federal Defender

cc: AUSA Timothy Ly  
U.S. Pretrial Services Officer Laura Gialanella